UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

John Johnson :

670 Marshall Road :

Glenmoore, PA 19343 :

v. :

Plaintiff :

ER Solutions, Inc. : 2011-06305

800 SW 39th Street Renton, WA 98057

and :

John Does 1-10 :

and : Jury Trial Demanded

XYZ Corporations :

Defendant(s)

PLAINTIFF'S ANSWER TO DEFENDANT'S MOTION TO DISMISS

For the reasons stated in the accompanying brief, Plaintiff requests that Defendant's motion to dismiss be denied. Or in the alternative, Plaintiff requests leave to file an amended complaint.

Date

/s/ Vicki Piontek 11-6-2011

Vicki Piontek, Esquire Attorney for Plaintiff 951 Allentown Road Lansdale, PA 19446 717-533-7472

Fax: 866-408-6735 palaw@justice.com

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CERTIFICATE OF SERVICE

On the 6th day of November, 2011, I served a true and correct copy of the attached answer to motion to dismiss on the following parties at the following addresses.

KAUFMAN DOLOWICH VOLUCK & GONZO LLP MICHAEL J. FARRELL, ESQUIRE 1777 SENTRY PARK WEST, SUITE 301 BLUE BELL, PENNSYLVANIA 19422

/s/ Vicki Piontek 11-6-2011

Vicki Piontek, Esquire Date

Vicki Piontek, Esquire Attorney for Plaintiff 951 Allentown Road Lansdale, PA 19446 717-533-7472

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